

EXHIBIT “A-6”

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1 calculator, Keller Newton calculator taught you
2 how to fish, right?
3 A. Yeah, I would -- I would say that it
4 was one of the tools that would teach us how to
5 fish it, because not -- this one tool wasn't
6 the -- it was part of it, right, so...
7 Q. A tool to put in the tool box.
8 A. No. Well, it's part of the tools,
9 right? It was part of -- it was going to be a
10 part of the overall design package.
11 Q. Having tools like that would help you
12 with your job at Array, wouldn't you?
13 A. I wouldn't think so because Array has
14 different methods of how they're doing their own
15 designs. They've been doing this for 30 years so
16 they have other tools. With my brief time there
17 it didn't seem like they're using a lot of the
18 same tools.
19 Q. But you've only been there a week.
20 A. I think I was there for a month. I was
21 a week at the Chandler office, but I was working
22 remotely for about three weeks or so, so -- but I
23 don't believe they use a tool like this.
24 Q. Okay. But it's fair to say that you're
25 still early on in your job at Array so you don't

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1 dimension of the tubular shape was squared at
2 NOV. An array is octagon, eight faces, sorry.
3 MR. ISRAEL: Octagonal.
4 THE WITNESS: Octagonal. Thank
5 you.
6 A. So with that information this tool
7 probably would not be beneficial. It's like this
8 tool has references in it that would -- like
9 certain equations that were used that may be a
10 reference to go research and figure out how this
11 equation works more accurately.
12 Q. (BY MR. LAPP) But this tool could be
13 used and modified for other configurations with
14 other inputs and other --
15 A. I'm not qualified for that. This
16 company is that's what they did.
17 Q. By the way, they're one of the industry
18 leading in what they do in the solar industry,
19 right?
20 A. I did not research them as far as how
21 big their footprint is. From what I know,
22 they're a fairly new company, maybe five or ten
23 years, I can't recall exactly, but yeah.
24 Q. Are you aware that the founders of
25 Keller Newton are former Array people?

Keller Newton
former Array
employees

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1 know all of the things that they do or don't do
2 or the tools they do or don't use.
3 A. That may be true. But also one thing
4 to remember is that this tool was essentially
5 fine tuned for NOV's parameters, so -- and one of
6 the things that this company did was to apply
7 a -- what do you call it -- like a no-go/go-gauge
8 kind of thing. So if we're outside of the
9 parameters of what they designed it for, because
10 without going into details of the NOV system,
11 there were certain things that they implemented,
12 that if they went outside of these parameters
13 that are all in yellow or orange, I guess -- it's
14 hard to --
15 Q. Where are you referring?
16 A. Page 8. So you can see here that on
17 page 8 you have a variable called H and that's
18 the dimension of the tubular shape. So right now
19 it's set at five, so if we would go beyond a
20 certain point, then the tool will notify us that
21 this tool is no longer valid.
22 So this is specific to the NOV
23 system. That's how this company generated it.
24 So to its fullest use or extent, this probably
25 wouldn't benefit Array, because, for one, the

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1 A. I know that John Williamson is, yes.
2 He used to work for Array. He was there for a
3 long time.
4 Q. Do you know Mr. Williamson?
5 A. Yes.
6 Q. Did you know him before NOV retained
7 Keller Newton on this project?
8 A. No, I did not, sir.
9 Q. Again, just for the record, I apologize
10 if I've asked this question, but the document
11 that's Exhibit 17, the Keller Newton report, is
12 among the documents that were on the thumb drive
13 that you took when you left NOV, correct?
14 A. It may be.
15 Q. Okay. Well, in fact, is -- let's look
16 back at Exhibit Number 2.
17 Q. So Exhibit Number 2, Mr. Garza, if you
18 look at lines 2, 3 and 4 on Exhibit Number 2 --
19 A. Uh-huh.
20 Q. -- 4-22-2022, April 22nd, 2022 was the
21 date of the event time.
22 A. Correct.
23 Q. If you look over in the far column H,
24 the file path, it's the NOV task summary outcome.
25 A. Right.